

District Judge Jamal N. Whitehead

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF
ESTHER; PLAINTIFF JOSEPHINE;
PLAINTIFF SARA; PLAINTIFF ALYAS;
PLAINTIFF MARCOS; PLAINTIFF
AHMED; PLAINTIFF RACHEL;
PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and
LUTHERAN COMMUNITY SERVICES
NORTHWEST,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,
MARCO RUBIO, in his official capacity as
Secretary of Homeland Security;
DOROTHY A. FINK, in her official
capacity as Acting Secretary of Health and
Human Services,

Defendants.

CASE NO. 2:25-cv-00255-JNW

UNOPPOSED MOTION TO
EXTEND TIME TO FILE A
RESPONSIVE PLEADING

Unopposed Motion to Extend Time
To File a Responsive Pleading
No. 2:25-cv-00255-JNW

U.S. DEPARTMENT OF JUSTICE
CIVIL DIVISION, OFFICE OF IMMIGRATION LITIGATION
P.O. BOX 868
BEN FRANKLIN STATION
WASHINGTON, DC 20044
202-746-8537

1 Defendants respectfully submit this motion for a 14-day extension of time to prepare a
2 responsive pleading to the complaint, which is currently due on Monday, April 14, 2025.
3 Should the Court grant this motion, the new date to file a responsive pleading would be April
4 28, 2025. Counsel for Plaintiffs informed undersigned counsel for Defendants that Plaintiffs
5 do not oppose a 14-day extension.

6 There is good cause to grant this motion. Counsel for Defendants needs additional
7 time to confer with the Defendant agencies to prepare a responsive pleading. Counsel for
8 Defendants has been occupied briefing numerous motions and other filings in this case,
9 which has limited Counsel's ability to confer with Defendant agencies regarding their
10 response to the Complaint. Counsel for Defendants has also been occupied conferring with
11 Defendant agencies in the wake of the Court's April 9 hearing and its subsequent order.
12 Counsel for Defendants is working diligently with Defendant agencies to prepare for next
13 steps in light of the Court's April 9 Order and the Court's forthcoming order on Plaintiffs'
14 motion to enforce the Court's first preliminary injunction. This request for an extension of
15 time is made in good faith and not intended to cause delay or otherwise prejudice Plaintiffs.

16 As such, Defendants request that the Court grant a 14-day extension of time to answer
17 or otherwise respond to the complaint, which would make the new answer date April 28,
18 2025.
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1 DATED this 11th day of April, 2025.

2 Respectfully submitted,

3 YAAKOV M. ROTH
4 Acting Assistant Attorney General
5 Civil Division

6 MICHELLE LATOUR
7 Deputy Director

8 s/ Joseph McCarter

9 JOSEPH MCCARTER
10 (MD BAR NO. 2311290014)
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24 No. 2:25-cv-00255-JNW

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